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ATTORNEY FOR DEBTOR, JEAN GASKINS

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

IN RE:	)	CASE NO. 15-20530/RG
	)	
JEAN GASKINS,	)	Chapter 7
	)	
	)	Judge: Rosemary Gambardella
DEBTOR.	)	
	)	Objection Deadline: May 31, 2016

**OBJECTION TO CHAPTER 7 PANEL TRUSTEE'S APPLICATION FOR RETENTION  
OF PROFESSIONAL KINZEL & Co., LLC AS ACCOUNTANT**

The Debtor, Jean Gaskins, through her counsel, Roger Chavez, objects to the Chapter 7 Panel Trustee's application to employ Kinzel & Co., LLC as accountants in the above-captioned case on the following grounds:

1. Debtor filed a Chapter 7 case in this jurisdiction on June 4, 2015 through prior counsel, Jose R. Torres.
2. On May 31, 2016, the Debtor filed a Cross Motion to Convert her Case to Chapter 13. The motion is returnable on June 7, 2016 at 10:00AM.
3. In light of the fact that the Debtor has not displayed bad faith in this matter, her application to convert to Chapter 13 should be granted.
4. If the conversion cross motion is granted, the Chapter 7 Trustee's involvement in this case will be immediately terminated; thus, negating the necessity to employ additional professionals in this case.

5. Since the Debtor has decided to file for a conversion of her case to Chapter 13, the Trustee's involvement, by operation of 11 U.S.C. § 348(e), would be effectively terminated, thus, mooted his application for retention of Kinzel & Co., LLC.

WHEREFORE, the Debtor objects to the Chapter 7 Panel Trustee's Application to Employ Kinzel & Co., LLC as professionals and prays that said application be denied.

Respectfully submitted,

Dated: May 31, 2016

/s/ Roger Chavez  
Roger Chavez, Attorney for Debtor